IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

DAVIS INTERNATIONAL, LLC, HOLDEX, LLC,: FOSTON MANAGEMENT, LTD, and : OMNI TRUSTHOUSE, LTD, :

Plaintiffs,

v. : No. 04-1482-GMS

NEW START GROUP CORP., VENITOM CORP.,:
PAN-AMERICAN CORP., MDM BANK,
URAL-GORNO METALURAGICAL COMPANY,:
EVRAZ HOLDING, MIKHAIL CHERNOI,
OLEG DERIPASKA, ARNOLD KISLIN,
MIKHAIL NEKRICH, and ISKANDER
MAKMUDOV,

Defendants.

SUBSTITUTION OF COUNSEL

PLEASE withdraw the appearance of Stephen E. Jenkins as lead attorney for defendant MDM Bank and enter the appearance of Richard I.G. Jones, Jr. as lead attorney for defendant MDM Bank in the above-captioned matter.

ASHBY & GEDDES

/s/ Stephen E. Jenkins (#2152)

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Dated: March 29, 2005

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ASHBY & GEDDES

/s/ Richard I.G. Jones, Jr. (#3301)

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CERTIFICATE OF SERVICE

I hereby certify that on March 29, 2005, I electronically filed the attached SUBSITUTION OF COUNSEL with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following:

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